



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 13, 2018

Ms. Arianna Shorey
Agent for Douglas Products and Packaging Company, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: PRIA Label Amendment – Modifying/Updating of Precautionary Language
Product Name: Max Kill Vapo-Cide
EPA Registration Number: 1015-68
Application Dates: December 15, 2015, March 6, 2018 & June 14, 2018
Decision Numbers: 512272, 541927 & 543633

Dear Ms. Shorey:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327, or via email at Rodia.Carmen@epa.gov.

Sincerely,



Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Registration Division (7505P)
Office of Pesticide Programs

*Enclosures: Stamped "Accepted" Master Label, dated November 13, 2018
Acute Toxicity Review, dated November 6, 2018*

Restricted Use Pesticide

Due to primary eye and primary skin irritation.

For retail sale and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified applicator's certification.

DICHLORVOS

GROUP

1B

INSECTICIDE

Max Kill Vapo-Cide

For use in warehouses, railroad cars, stationary trucks, flour mills, grain mills, rice mills, grain handling facilities and other food processing plants.

Active Ingredient:

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate)

5.00%

Other Ingredients **

95.00%

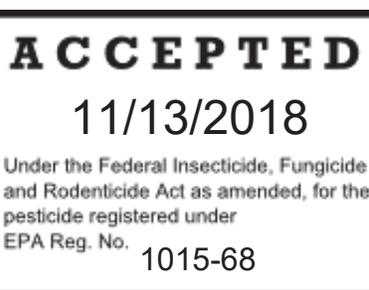
Total

100.00%

**Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN DANGER/PELIGRO

| FIRST AID | |
|---|--|
| If in eyes: | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |
| If on skin or clothing: | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice. |
| If swallowed: | <ul style="list-style-type: none">• Immediately call a poison control center or doctor.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give any liquid to the person.• Do not give anything by mouth to an unconscious person. |
| HOT LINE NUMBER | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call 1-844-845-3129. | |



NOTE TO PHYSICIAN

Contains dichlorvos, an organophosphate that inhibits cholinesterase. Probable mucosal damage may contraindicate the use of gastric lavage. May pose an aspiration pneumonia hazard. Causes severe eye and skin damage.

Symptoms: Weakness, headache, tightness in chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

Treatment: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, atropine sulfate should be injected at 10 minute intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. Pralidoxime chloride (2-PAM) is also antidotal and may be administered in conjunction with atropine. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion in 250 cc of saline over a 15 to 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5 percent solution in water over not less than two minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children, the dose of 2-PAM is 0.25 grams. Morphine is an improper treatment. Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may without warning cause patient susceptibility to very small doses on any cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has been attained as determined by blood test. Contains petroleum distillates.

EPA Reg. No. 1015-68
EPA Est. No. 1015-MO-1

Manufactured by:

Douglas Products & Packaging
1550 East Old 210 Highway
Liberty, MO 64068
(816) 781-4250

Net Contents: (2.5, 5, 55 Gal.)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Contains petroleum distillates. Corrosive. Causes irreversible eye damage. Causes skin burns. May be fatal if absorbed through skin. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Do not contaminate food or feed products by direct contact with liquid.

Personal Protective Equipment (PPE) Statements

Some materials that are chemical-resistant to this product are listed below.

Mixer, loaders, applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants.
- Chemical-resistant gloves made of Barrier Laminate or Viton \geq 14 mils.
- Chemical-resistant footwear plus socks.
- Goggles or face shield.
- Chemical-resistant headgear for overhead exposure.
- When mixing and loading, or cleaning application equipment, wear a chemical-resistant apron over long-sleeved shirt and long pants.

- A NIOSH approved respirator with either an organic vapor (OV) cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TX-23C); or NIOSH approved gas mask with a canister approved for pesticides (NIOSH approval TC-14G) 14G); or a NIOSH approved powered air purifying respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.

USER SAFETY REQUIREMENTS

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Outdoor Use: This product is toxic to birds, fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

Indoor Use: Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or public waters in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS

- Apply this product only as specified on the EPA approved label.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected workers wearing specified PPE may be in the area during application.
- Do not enter or allow people or pets to enter the treated area until sprays have dried.
- Do not use in hand-held foggers or hand-held smoke generator equipment.
- Do not use in residential sites as a crack-and-crevice or space spray.
- Do not use in on lawns, turf, or ornamentals.
- Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed, in serving areas while

- food/feed is exposed or facility is in operation.
- Use of this product in greenhouses or mushroom houses is prohibited.
 - For use in warehouses, silos, bulk bins, food processing and food manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food commodities or bulk raw or processed food commodities. The term “non-perishable” means any raw or processed food or feed not subject to rapid decay or deterioration that would render it unfit for consumption. Raw commodities include animal feeds, cocoa beans, dried beans, grain crops, peanuts, soybeans, and nut crops. Raw commodities do not include eggs, milk, meat, poultry, fish and fresh fruits and vegetables. Processed foods and feeds include feed and feed ingredients, milled fractions of listed raw commodities, flour, sugar, cereals, packaged goods and crackers. Processed foods do not include hermetically sealed foods or manufactured dairy products and other processed foods requiring freezing or refrigeration.
 - When using in food processing, food manufacturing, handling and storage areas:
 1. Apply only during times when plant is not in operation and no processed foods or feed products are exposed. If bulk, unpackaged, processed foods or feed are exposed, remove or cover before treatment begins.
 2. All food processing surfaces should be covered during treatment or thoroughly cleaned before using.
 - The space above uncovered, non-perishable raw agricultural commodities may be treated. Use only the volume above the commodity when calculating the space to be treated. **Note:** Use Is Allowed Only In Non-Food Areas Of The Following Plants:
 1. Bottling plants, frozen food plants, meat, poultry and seafood slaughtering and/or packaging plants and dairy product plants.
 2. Non-food/feed area of food/feed areas such as garbage rooms, lavatories, floor drains (to sewers entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling)).
 - Applicator must exit area to be treated prior to operating fogging or misting equipment remotely. Apply with remotely operated fogging or misting equipment at the rates given below. All fogging or space spray treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow workers to enter buildings during treatment. Do not allow unprotected workers to enter buildings during ventilation.
 - **NOTIFICATION:** Before the start of the application, post fumigation warning signs at all entrances to the building. The sign must bear the skull and crossbones symbol and state “DANGER/PELIGRO. Building under fumigation. DO NOT ENTER/NO ENTRE. [Date and time of fumigation]. Max Kill Vapo-cide Fumigant in use. [Name, address, and telephone number of the applicator].” The signs must be located prominently at each entrance, using a sign size and letter size that makes the sign clearly legible. All signs must be removed after the ventilation is complete and before routine entry by unprotected persons is permitted.
 - Entry by a person—other than a correctly trained and equipped handler who is performing a task related to ventilation or air concentration monitoring and who is wearing the personal protective equipment required for handlers—is PROHIBITED in the entire enclosed structure/building from the start of application until ventilation is complete. Ventilation is complete either when 24 hours have elapsed following application and the building has been opened and aired or when a direct-indication short-term concentration monitoring device (e.g. Draeger Tube) indicates that the DDVP air concentration is equal to, or less than, 0.050 ppm (50% of the OSHA PEL).
 - In California, the building cannot be reentered without personal protection for 24 hours, unless the DDVP air concentration is 0.01 ppm or less. In addition to the above sign specifications, in California, the following language must be on signs: "THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS. THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL

PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN 0.01 PPM. AN AIR CONCENTRATION OF 0.01 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT. DO NOT ENTER PRIOR TO AM OR PM ON (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE AT OR BELOW 0.01 PPM."

- For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep this product in its tightly closed original container when not in use. Do not store near heat or open flame. Store in a cool, well-ventilated, dry (preferably locked) area that is inaccessible to children and animals. Post as a pesticide storage area.

Drum Handling: Handle carefully to prevent damage and leakage. Open drums only when set on end and under a ventilated hood. Unscrew bungs slowly to release internal pressure.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency or the hazardous waste representative at the nearest EPA regional office for guidance.

Container Handling:

Nonrefillable Metal Containers (five gallons or less): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations. DO NOT cut or weld metal containers.

Nonrefillable Metal Containers (greater than five gallons): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations. DO NOT cut or weld metal containers.

Nonrefillable plastic containers (five gallons or less): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as

follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

Nonrefillable plastic containers (greater than five gallons): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

USE RATES AND APPLICATION DIRECTIONS

FOGGING (FOOD AND NON-FOOD AREAS)

Vapo-Cide may be used in listed sites for the control of the exposed stages of most species of stored-product insects i.e., rice weevils, granary weevils, confused flour beetles, saw-tooth grain beetle, cigarette beetles, Indian meal moths and coca bean moths.

Apply as fog using remotely operated fogging, remotely operated misting equipment, or as a ULV coarse spray at a rate of 1-2 grams of dichlorvos (½ to 1 fl. oz.) per 1,000 cu. ft.

Keep a minimum of a 7 day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams A.I. per 1,000 cubic feet of head space.

Do not make applications when temperatures are below 60 degrees F.

SPACE SPRAY AND CONTACT SPRAY (NON FOOD/FEED PROCESSING AREAS ONLY)

Space and Contact Spray: Dilute to 1-3% with an approved solvent and apply at the rate of 1 gal. of spray per 64,000 cu. ft. to kill roaches, silverfish, fleas, waterbugs, earwigs, ants and spiders in sheltered situations. Adjust a ULV or fogger spraying device (remotely operated) to a coarse spray. Contact as many of the insects with the spray as possible. Thoroughly spray all parts of the room suspected of harboring these insects. Then adjust the spraying device to deliver a fine spray for use as a space spray. Repeat treatment as necessary.

Contact Spray Only: Dilute 1% and spray 1 pint per 1,000 sq. ft. of floor space.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed, in serving areas while food/feed is exposed or facility is in operation.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once. By

using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties, and Limitations of Liability.

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as presence of other materials, or the manner of use or application, all of which are beyond the control of Douglas Products and Packaging. All such risks shall be assumed by the user or buyer.

To the extent consistent with applicable law, Douglas Products and Packaging makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Douglas Products and Packaging is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Douglas Products and Packaging disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Douglas Products and Packaging's election, the replacement of product.

Lot No. _____

[EPA APPROVAL DATE]